

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Danville Division**

UNITED STATES OF AMERICA

v.

Criminal Case No. 4:04-CR-70083-002

ANTHOINE PLUNKETT

FIRST MOTION FOR ADDITIONAL INVESTIGATIVE SERVICES

COMES NOW Defendant Anthoine Plunkett, by counsel, and moves this Court for additional investigative services. At the Court's direction, this Motion is filed on the public record. It is, therefore, filed electronically. The Motion will be supported by a Memorandum in Support, which will be accompanied by a proposed order and Motion to Seal. The Memorandum in Support, proposed order and Motion to Seal will be filed by mail with the Clerk of Court in Danville. In support of his Motion, Defendant says:

The defense budget previously approved in this case includes a gross number of hours allocated to each of several investigators. This Court has, however, currently authorized the actual expenditure of only a portion of the gross hours allocated to each of these persons. One of these persons has expended his/her authorized hours. Many additional investigative tasks are necessary to prepare the defense of this case. The Memorandum in Support will include more detailed information. Defendant, therefore, moves this Court to authorize the actual expenditure of an additional portion of the previously approved gross hours.

/s/ Roger D. Groot
Anthoine Plunkett
By counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of June, 2005, electronically filed Defendant Plunkett's First Motion for Additional Investigative Services with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Anthony P. Giorno, Esq., Craig J. Jacobsen, Esq., Assistant United States Attorneys, and William H. Cleaveland, Esq., and James C. Turk, Jr., Esq., Counsel for Defendant Bodkins.

/s/ Roger D. Groot